

1 DAVID S. WILSON, III, (SBN 174185)
2 **FEDERAL EXPRESS CORPORATION**
3 2601 Main Street, Suite 340
4 Irvine, CA 92614
5 Telephone: 949.862.4656
6 Facsimile: 901.492.5641
7 dswilson@fedex.com

8 Attorney for Defendant
9 **FEDERAL EXPRESS CORPORATION**

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

CARMEN JOHN PERRI, an individual,

Plaintiff,

vs.

FEDERAL EXPRESS CORPORATION, a
Delaware corporation; HAWTHORNE USA, INC.
WHICH WILL DO BUSINESS AS
DELAWARE HAWTHORNE USA, INC., a
Delaware corporation; and Does 1-10,

Defendants.

Case No. 2:18-cv-04607-ODW-JEM

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS [L.R. 8-3]**

Complaint Served: June 12, 2018

Current Resp. Date: July 3, 2018

New Response Date: July 18, 2018

STIPULATION

1. Plaintiff Carmen John Perri (“Plaintiff”) and Defendant Federal Express Corporation (“FedEx”), hereby submit, through their undersigned counsel of record, pursuant to Local Rule 8-3, the following Stipulation:

2. WHEREAS, on May 25, 2018, Plaintiff filed this action against FedEx;

3. WHEREAS, on June 12, 2018, Plaintiff caused the Summons and Complaint to be served on FedEx, thus rendering FedEx’s response to the Complaint to become due on or before July 3, 2018;

4. WHEREAS, the parties agree that FedEx may have an additional 15 days in which to respond to the Complaint.

1 5. WHEREAS, FedEx's response to Plaintiff's Complaint shall now be filed on or before July
2 18, 2018.

3 6. WHEREAS, the parties further agree that the extension of time for FedEx to respond to the
4 Complaint will not alter the date of any event or any deadline already fixed by Court order.

5 DATED: July 3, 2018

MANNING LAW, APC

6 BY: /s/ Craig G. Côté
7 Craig G. Côté
8 Attorney for Plaintiff
CARMEN JOHN PERRI

9 FEDERAL EXPRESS CORPORATION
10 BY: /s/ David S. Wilson
11 David S. Wilson
12 Attorney for Defendant
FEDERAL EXPRESS CORPORATION

13 *Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(i) regarding signatures, David S.*
14 *Wilson, III hereby attests that concurrence in the filing of this document and its content has been*
15 *obtained as to all signatories listed.*

16
17 Dated: July 3, 2018

Respectfully submitted,

18
19 By: /s/David S. Wilson
David S. Wilson

20 Attorney for Defendant
21 FEDERAL EXPRESS CORPORATION
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2018, I caused the foregoing document to be filed with the Clerk of Court via CM/ECF, which will send notice to the following CM/ECF participants:

Joseph R. Manning, Jr., Esq.
Michael J. Manning, Esq.
Craig G. Cote, Esq.
MANNING LAW, APC
4667 MacArthur Blvd., Suite 150
Newport Beach, CA 92660

Attorneys for Plaintiff

/s/David S. Wilson
David S. Wilson

#1286645